



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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April 21, 2025

By ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *New York Times Co. v. DOD*, 22 Civ. 10299 (GHW) (VF)

Dear Judge Figueredo:

The parties write respectfully to provide a status report in the above-named action brought under the Freedom of Information Act ("FOIA"). This action involves FOIA requests submitted by Charlie Savage, a reporter with The New York Times Company (collectively, the "Times"), to the U.S. Department of Defense ("DoD") and its component, the United States Special Operations Command ("SOCOM"). The FOIA requests to DoD have been resolved.

With regard to the FOIA request to SOCOM, the parties met and conferred regarding the productions by DoD and SOCOM. As a result of those discussions, DoD conducted a limited supplemental search for additional potentially responsive records. To date, that search has not yielded any additional responsive records. DoD is currently evaluating whether there are any other locations where responsive records are reasonably likely to be located, to determine whether any further search efforts are warranted. DoD and SOCOM are also reviewing their prior productions to determine if any further information is appropriate for release. DoD made supplemental releases of additional material on February 25 and April 21, 2025. DoD is currently reviewing the last group of records to determine whether any additional information can be released.

The parties will continue to meet and confer in an effort to narrow or eliminate any issues requiring litigation. The parties respectfully propose to submit a further status report on or before June 20, 2025.

We thank the Court for its consideration of this submission.

Respectfully submitted,

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